

## Comments of George Jackson on RM-11338

As a retired consulting broadcast engineer I have looked over the RM-11338 document and have come up with some opinions. I support the initiative of the NAB. I have read many of the comments made by others. I believe many of the suggestions for implementation are very good. I am particularly impressed with the detailed comments of Larry Langford. I support his call for a "pecking order" for AM stations to be granted the right to use FM translators. I would also offer my own rather strict plan for this "pecking order."

First and foremost, Class A stations may NOT apply for translator service, period. If they cannot get coverage of their city of license and surrounding area with 50 Kilowatts of power, FM is not the answer.

Lets look at the remaining classes. First priority should go to stations whose owner does not have any FM broadcast interests in the market. By same market I would clarify by stating that the definition would be that any co owned FM station could not be located close enough that any part of its 60dbu contour overlaps the 2 mv/m contour of the AM station making application. This would ensure that owners who have an FM in one town and an AM in the same market but licensed to another town, do not get to use a loophole to get stand alone designation for the AM. I would also hope the Commission would find a way to reward the single station stand alone owner. In other words the non group owners who have only one station to operate. Otherwise known to many as the true Mom Pop stations who are in the most desperate conditions right now.

With the above understanding of what a stand alone really is, here is my suggested priority order.

1. Stand Alone Class D currently not allowed any night power ( true daytimer)
2. Stand alone Class D with unprotected PSSA operation with less than 50 watts ( could be scaled for dial position)
3. Stand alone Class D with unprotected PSSA operation with more than 50 watts ( could be scaled for dial position)
4. Stand alone Class B with protected night power lower than day
5. Stand alone Class C with same power day and night on local channels.

6. Class B stations with unusual circumstances to be determined on case by case basis.

AM stations which are the only commercial station assigned to their city of license and located more than 20 miles from a recognized metro area or whose 2mv/m contour does not cover a metro area, would get an additional preference. In this way stations in the more rural areas not in the city grade contour of larger metro stations would get first preference. These stations would have the best chance of finding open translator frequencies.

I would also agree with Mr. Langford's call for the FCC to assign FM translator frequencies to AM stations which qualify for top preference as stated in 1 and 2 above, with the additional preference of non metro location.

I would ask the NAB to clarify what it thinks should be the regulation controlling the number of translators any AM station can operate. If the NAB proposes to hold translator power to 250 watts ERP, I can see cases where the AM stations 2mv/m contour could cover several small towns and still be within the 25 mile limit. Would NAB support multiple translators for such a station, each operating at low power and located within each of the covered towns?

Or would NAB suggest higher translator power as long as the 25mile/60dbu-2mv/m limits are not exceeded?

I am sure NAB will have much to say in its reply to comments. I also hope the Commission moves quickly to implement this historic and much needed relief for the heritage band where local community service still exists.

George Jackson PE (retired)